

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

APPLYA CORPORATION,  
a Delaware corporation,

Plaintiff,

v.

TBG TECH CO. LLC,  
a Florida limited liability company,  
and JOHANNES FLOE,

Defendants.

Civil Action No.: 1:23-cv-21290-DPG

**DECLARATION OF ATTORNEYS' FEES AND COSTS**

I, Steven M. Berman, being first duly sworn on oath, state as follows:

1. I make this affidavit based upon my personal knowledge and upon records maintained in the ordinary course of the Firm's business.

2. All facts contained herein are true and correct.

3. I am a partner with the law firm of Shumaker, Loop & Kendrick, LLP (the "Firm"), in Tampa, Florida. I am licensed to practice law in the State and Federal courts in Florida. Our firm represents the Plaintiff in this case, Applya Corporation ("Applya"), along with Walker Gressette Linton LLC.

4. I have been licensed to practice law in the State of Florida since 1990 and, at all times since the issuance of my license, I have been a member in good standing of the Florida Bar. My Florida Bar number is 856290.

5. Our Firm's primary area of practice is commercial civil litigation. I also have a background in and focus much of my practice on creditors' rights and regularly represent creditors

in bankruptcy, debt collection, and judgment collection matters.

6. Applya engaged our Firm and Walker Gressette Linton to pursue the claims asserted in this lawsuit and to carry-out supplemental proceedings and post-judgment collection efforts against these Defendants and any other liable parties on a contingency fee basis. The agreed upon fee is forty percent (40%) of any recovery, whether by way of settlement, judgment, or verdict.

7. Through March 6, 2024, our firm has expended the following time in this case:

<u>Attorneys and Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Steven M. Berman	18.60	\$535.00	\$10,788.00
Steven M. Berman	3.40	\$635.00	\$2,159.00
Seth P. Traub	9.40	\$430.00	\$4,042.00
Elizabeth R. Brusa	7.80	\$375.00	\$2,925.00
Carolyn Parrish	.20	\$50.00	\$50.00
Laura Hutton	3.90	\$275.00	\$1,072.50
<b>TOTAL:</b>	<b>43.3</b>		<b>\$21, 036.50</b>

This the 8<sup>th</sup> day of March, 2024.




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Steven M. Berman